



**Department of Transportation
Federal Motor Carrier Safety Administration
Development of a North American Standard
For Protection against Shifting and Falling Cargo
Notice of Proposed Rulemaking
Docket No. FMCSA-97-2289**

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Dominion Virginia Power and Dominion North Carolina Power are subsidiaries of Dominion Resources, Inc. which is a fully integrated gas and electric public utilities company that serves over 4 million customers in several states. Dominion Virginia Power/Dominion North Carolina Power is pleased to submit these comments to the Federal Motor carrier Safety Administration in response to the notice of proposed rulemaking titled Development of a North American Standard for Protection against Shifting and Falling Cargo, Docket number 97-2289.

Virginia Power has the following comments concerning areas where more detail may be needed in the final rule:

1. There needs to be more clarity in the differences between a "direct tiedown" and an "indirect tiedown". The examples given in the proposed standard are confusing and require more detailed information in order to distinguish one from the other. Perhaps the final rule could provide illustrations to explain the differences.
2. Charts or tables showing derating factors for each tiedown angle to comply with the deceleration forces (0.8 g forward, 0.5g rearward and 0.5 g lateral) would be invaluable in aiding in compliance with this regulation.
3. There should be some guidelines for the rejection of nylon straps in the final rule.

Dominion Virginia Power/Dominion North Carolina Power feels that the aforementioned comments will enhance the overall content of the rulemaking, which will ultimately increase compliance. Thank you again for allowing us to participate in the rulemaking and we trust that our suggestions will be considered.

Signed: _____
Stanford R. Wells, Jr.